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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Preparation for International
Telecommunications Union World
Radiocommunication Conferences

IC Docket No. 94-31

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MOTION FOR EXTENSION OF TIME

COMSAT Corporation, through its COMSAT Mobile Communications division ("COMSAT"), hereby moves for an extension of time to file reply comments concerning the Second Notice of Inquiry ("Second NOI") in the above-captioned proceeding from March 21, 1995, until April 14, 1995. COMSAT submits that the requested extension of time will enable interested parties to prepare more detailed and substantive responses to the issues raised in the Second NOI and in the comments to be filed on March 6, 1995, in this proceeding.

The instant proceeding requests comments on a broad range of complex issues, including mobile satellite service ("MSS") allocations and related technical matters, which will be considered at the 1995 World Radiocommunication Conference ("WRC-95") to be held in Geneva from October 23 to November 17, 1995. COMSAT, along with other MSS industry representatives, has been actively participating in the preparations for WRC-95 through both the Industry Advisory Committee ("IAC") and its component Informal Working Groups. As such, we understand the breadth and significance of the issues to be addressed at WRC-95 and are concerned that the Commission's current deadline for

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reply comments on the Second NOI will not permit sufficient time for interested parties to comment fully on the topics at issue.

Many of the same parties who are participating in the preparations for WRC-95 also are involved in U.S. preparations for, and will be attending, the CITEL conference scheduled for March 13-17 in Venezuela. The same parties also are spending considerable time in preparing for the WRC-95 Conference Preparatory Meeting ("CPM") which will take place in Geneva from March 22 to April 5, 1995. In addition, the Commission is seeking comments and reply comments in its domestic proceeding to allocate spectrum at 2 GHz for use by MSS on March 9, 1995, and March 27, 1995, respectively.¹ Accordingly, there will be relatively little time for interested parties to fully respond to the comments filed in this proceeding by the current reply deadline of March 21, 1995.

In addition, we believe it will be extremely useful for interested parties to have the benefit of the results of the CPM before making reply comments in this proceeding. The CPM will provide valuable insight concerning the international community's response to the Commission's proposals to advance the dates of access for the 2 GHz MSS bands allocated at the 1992 World

¹Notice of Proposed Rule Making, ET Docket No. 95-18, FCC 95-39, released January 31, 1995 ("NPRM"). We note that American Mobile Satellite Corporation has filed a request for an extension of the comment and reply dates in the NPRM, and we support that request. See AMSC Motion for Extension of Time, ET Docket 95-18, filed February 22, 1995. Even if AMSC's Motion is granted, however, we do not believe that there is sufficient time to file reply comments in the instant proceeding by March 21.

Administrative Radio Conference and to allocate additional spectrum at 2010-2025 MHz and 2165-2170 MHz for global MSS systems.

COMSAT is mindful of the obligations on the Commission to compile the U.S. proposals for WRC-95, in consultation with the Department of Commerce's National Telecommunications and Information Administration and the Department of State, and to forward them to Geneva four months prior to WRC-95. We further understand that the IAC intends to provide its Final Report on WRC-95 to the Commission by May 1, 1995. We do not believe that the extension of time we are proposing herein will disrupt these efforts in any way. To the contrary, we believe that grant of COMSAT's request for extension will make the reply comments more informative and more valuable to the Commission.²

Counsel for American Mobile Satellite Corporation, Iridium, Inc., Loral/Qualcomm Partnership, L.P., and TRW Inc. have authorized COMSAT to inform the Commission that they fully support COMSAT's request for an extension of the reply date on the Second NOI until April 14, 1995.

²COMSAT notes that Commission, on its own motion, and in recognition of the breadth and complexity of the issues to be addressed at WRC-95, previously extended the comment and reply dates for the initial NOI in this proceeding. By Order, DA 94-566, released June 2, 1994, the Commission granted a five week extension of the initial WRC-95 NOI comment and reply deadlines and provided a full three weeks, after comments were filed, for the submission of replies.

For the reasons set forth above, COMSAT submits that the extension of time would be in the public interest and, thus, respectfully requests that the Commission grant its motion to extend the time for filing reply comments on the Second NOI in the above-captioned proceeding until April 14, 1995.

Respectfully submitted,

COMSAT CORPORATION

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